

In re: Jose Villena et al.  
Filed: December 7, 1999  
Serial No.: 09/456,166  
Page 6

REMARKS

This is a complete response to the outstanding final Office Action mailed June 2, 2005. Upon entry of the enclosed claim amendments, claims 16-27 remain pending in the present application. Applicant appreciates the Examiner's indication that all of the pending claims are allowable over the art of record.

The Examiner has requested that the applicant specifically state which portion of the claimed invention is new and which (if any) has been publicly known or used prior to the filing date of the application. The new portion of the claimed invention which is novel and non-obvious is providing a broadband connection between at least two switching apparatus and wherein each switching apparatus has at least a fourth point of interface B coupling only a number of broadband connections reserved for connecting one switching apparatus to another, wherein the number of broadband connections is greater than or equal to the number of incoming trunks plus the number of agent stations.

A switching apparatus with a broadband connection has been publicly known or used prior to the filing date of the application. For example, U.S. patent 5,754,636 by Bayless et al. (referred hereinafter "Bayless") issued on May 19, 1998 prior to

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2/25/05

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Serial No.: 09/456,166  
Page 7

the filing of this application on December 7, 1999 discloses a switching apparatus with a broadband connection. Figure 1 of Bayless discloses a switching apparatus (element 16) with a broadband connection (element 17) providing channels for incoming trunks (element 46), agent stations (element 44), and resources (elements 50). Applicant disclosure of the CCPRO was illustrative of these well-known switching devices and is within the knowledge of someone skilled in the art of telephony switching apparatus.

Applicant maintains that switching devices with broadband connection having multiple channels are well-known products. In support of this, Applicant has filed a Declaration under 37 CFR § 1.132 of Eyal Ben-Chanoch, an article released in June 1999 by Tern Systems, and the Bayless patent herein as illustrative of the known prior art. Accordingly, Applicant respectfully submits that the CCPRO and other switching devices are in the conventional art and are known to one of ordinary skill in the relevant art namely, in the art of telephony and contact center switching and contact handling.

Applicant further submits that time division multiplexing of communication channels is also known in the art. The switching arrangement as disclosed by Applicant may be implemented using

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Serial No.: 09/456,166  
Page 8

time division multiplexing (TDM) (for example, although other methods may be used) as disclosed in Applicant's specification. Based on Applicant's disclosure, it would be apparent that physical channels of communication might alternately be multiplexed channels within a physical channel. Therefore, the rejections of claim 16-27 under 35 U.S.C. § 112, 1st paragraph, is improper. Applicant respectfully requests reconsideration and withdrawal of the claim objections.

The Applicant traverses all of the objections of the Office Action. Applicant presents aspects of the application that have been publicly known prior to filing of this application and aspects the Applicant regards as the invention. Applicant appreciates the Examiner's review of the above-identified patent application and respectfully requests reconsideration and allowance in view of the above remarks

#### CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections have been traversed, rendered moot and/or accommodated, and that presently pending claims 16-27 are in condition for

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Serial No.: 09/456,166  
Page 9

allowance. Applicant has responded to all of the Examiner's requests. Favorable reconsideration and allowance of the present application and the presently pending claims are hereby courteously requested. The examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

Respectfully submitted,

Jose Villena et al.

By   
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 COMMISSIONER OF PATENTS  
 P.O. Box 1450  
 Alexandria, VA 22313-1450

Attorney Docket No.: CELLIT-003XX

Sir:

In re application of: Jose Villena et al.

Entitled: Non-Blocking Expandable Call Center Architecture

Transmitted herewith is an amendment (9 pages) in the above-identified application. The following checked items are applicable:

- [X] a two-month extension of time for response within the second month is requested and the appropriate fee in the amount of \$450 is to be charged to deposit account 02-3285.

| CLAIMS AFTER AMENDMENT:                          | MINUS PRIOR PAID CLAIMS: | EQUALS PRESENT EXTRA CLAIMS: | RATE:         | ADDITIONAL FEE: |
|--------------------------------------------------|--------------------------|------------------------------|---------------|-----------------|
| Independent 1                                    | - 7                      | =                            | x \$200.00 =  | \$0             |
| Total 11                                         | - 20                     | =                            | x \$ 50.00 =  | \$0             |
| [ ] Multiple Dependent Claims (1st presentation) |                          |                              | + \$ 360.00 = | \$0             |
| SUBTOTAL ADDITIONAL CLAIM FEE                    |                          |                              |               | \$0             |
| Small Entity filing, divide by 1/2.              |                          |                              |               |                 |
| TOTAL ADDITIONAL CLAIM FEE                       |                          |                              |               | \$0             |

- [X] No additional claim fee.
- [X] In the event a Petition for Extension of Time is required by this paper and not otherwise provided, such Petition is hereby made and authorization is provided herewith to charge Deposit Account No. 02-3285 for the cost of such extension.
- [X] The Commissioner is hereby authorized to charge payment of any additional filing fees under \$1.16 associated with this communication or credit any overpayment to Deposit Account No. 02-3285.

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as first class mail in an envelope addressed to: Commissioner of Patents, Alexandria, VA, 22313-1450 on August 4, 2003.

SUBMIT IN TRIPLICATE

 Attorney of Record: Andrew R. Martin, Esq.  
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